

***Consolidated Public Comments on the FY 2002 and 2003
Richland Operators Office***

As part of the U.S. Department of Energy, Richland Operation Office's (DOE-RL) continuing commitment to involve the public in the development of its budget requests, RL hosted public meetings in Richland, Seattle, Hood River and Portland in the spring of 2001.

The following summary includes comments are compiled from forms turned in at each meeting, audiotapes made at each meeting and questions and comments mailed to RL. While each individual comment has not been specifically addressed, we believe these consolidated comments reflect the statements expressed at these meetings.

Because there are two DOE field offices at Hanford, RL and the Office of River Protection (ORP), each office answered only question relevant to that office. RL's responses are provided below and ORP's will be added when available.

You may find that being on the Hanford Cleanup mailing list helps you to stay abreast of Hanford issues. To add your name to the mailing list call: 1-800-321-2008, or write P.O. Box 1000, H8-64, Richland, WA 99352 or click on <http://www.hanford.gov/pubninvolve.html> If you have question about the process or these responses, please contact Gail McClure, RL, Public Involvement Manager on (509) 373-5647.

Summary of Public Comments
From Meetings Held in Richland, Hood River, Portland and Seattle In March, 2001

Comment 1: Budget data was released later than usual by the U.S. Department of Energy (DOE) and there was not sufficient opportunity for input from the regulators and stakeholders.

Response: Budget information for Fiscal Years 2002 and 2003 was not released until April. Normally information is available in January or early February. We agree there was less opportunity for input into the budget process than usual. DOE Richland Operations Office (RL) would have preferred substantially more and earlier interaction with regulators. We believe we can look forward to conducting our normal regulator and stakeholder budget interactions next year.

Comment 2: RL must seek full funding to comply with the Tri-Party Agreement and cleanup the site quickly.

Response: In the Richland Operations Office Fiscal Year 2003 Environmental Management Budget Submittal, we requested funding for full compliance as required by the Tri-Party Agreement. As the Fiscal Year 2003 budget process continues, RL will proactively convey how critical full compliance funding is to the protection of human health and the environment.

Comment 3: The new Fluor Hanford, Inc. contract incentivizes some work not required by the Tri-Party Agreement, does not support the Hanford 2012 plan, and does not control indirect costs.

Response: The contract requires compliance with the Tri-Party Agreement work and is consistent with the Hanford 2012 plan. While some of the work incentivized in the Fluor Hanford, Inc. (FHI) contract is not required by the Tri-Party Agreement, RL believes this work warrants attention. Further, RL is not proposing this work be done instead of necessary Tri-Party Agreement requirements, but in addition to Tri-Party Agreement work.

Commenters frequently pointed to the contract incentive on removing wastes from old rail cars as work not required by the Tri-Party Agreement. For several years, the State of Washington Department of Ecology staff has pressed to accelerate this work and has suggested that failure to make progress could bring enforcement action.

Regarding indirect charges, the new contract requires FHI to find an additional \$235 million in savings through the life of the contract. Because many of the savings will need to come from reductions in indirect costs, RL believes this is more than enough incentive for FHI to control indirect costs.

Comment 4: Stop importing low and mixed low-level waste to Hanford from across the DOE complex. Cleanup funds should not be used on imported new waste. Waste should not be disposed in unlined trenches.

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Response: We understand that there is concern about importing more waste to Hanford. However, consistent with the Waste Management Programmatic Environmental Impact Statement, and DOE Secretarial guidance, RL will continue to accept offsite waste. Hanford budget requests always indicate that offsite waste is to be received, in hopes that additional funds will be provided. It is important to remember that Hanford also ships some of its waste offsite, including uranium to Portsmouth, Ohio and transuranic waste to the Waste Isolation Pilot Plant (WIPP) in Carlsbad, New Mexico.

The use of unlined trenches for low-level waste is consistent with national regulations for non-DOE work and international practice. Monitoring data and analysis all indicate that releases to groundwater from our low-level burial ground operations are small or non-existent. Spending cleanup money to line these trenches is unnecessary and would take money away from other urgent work.

Comment 5: Transuranic waste should not be shipped to the Waste Isolation Pilot Plant in New Mexico, but rather should be neutralized and kept at Hanford.

Response: No process exists to fully neutralize radioactive waste, although some processes, such as combining these wastes with glass, can be used to stabilize wastes. These concepts were all addressed in several studies and Environmental Impact Statements. DOE concluded that given current technology, the best choice is to dispose of such waste in the deep salt repository at the Waste Isolation Pilot Plant.

Comment 6: Protect and clean up the River Corridor, including the 300 Area to an “unrestricted use” standard.

Response: The Environmental Protection Agency selected the cleanup standards under the Comprehensive Environmental Response, Compensation, and Liability Act in their Records of Decision for most of the River Corridor. In the 300 Area, the regulators opted for an “industrial use” standard. Along most of the rest of the River Corridor, they selected an “unrestricted use” standard. This allows for residual contamination to remain in place 15 feet or more below the surface provided that groundwater is protected.

An “unrestricted use” standard in the 100 Area will allow people to move freely about and build structures with basements as deep as 15 feet below the surface – although, according to both the Comprehensive Land Use Plan and the Hanford Reach National Monument proclamation no such structures are expected to be built there. There would also likely be restrictions on use of groundwater until groundwater remedies and natural decay reduce contamination to drinking water standards.

The “industrial use” standard selected by regulators for the 300 Area is consistent with projected future use of the 300 Area. We remain committed to the cleanup standard set forth in the Records of Decision.

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Comment 7: Take care of the 618-10 and 618-11 burial grounds now.

Response: Under the Tri-Party Agreement, the Environmental Protection Agency and DOE must establish a cleanup schedule by June 2002. We intend to meet that regulatory commitment. We continue to monitor these burial grounds and if we find we need to remediate them faster, we will attempt to do so.

Comment 8: Protect groundwater from further contamination; do more clean up.

Response: Groundwater is one of our highest priorities. Considerable effort is underway to identify and control sources of groundwater contamination. We are pumping liquids from the single-shell waste tanks; characterizing the past leaks from the single-shell waste tanks; reducing potential for water recharge at these sites; and upgrading existing pump-and-treat systems.

Comment 9: Clean the site up faster.

Response: RL believes stakeholders and the people who make decisions to fund our work need to see progress. "Hanford 2012" is our plan to do that. We want to complete work along the Columbia River, show visible progress, and set realistic goals for completion of work in the next 10 years. We will accelerate cleanup in the entire River Corridor, but most notably will pull in cleanup schedules in the 300 Area from 2040 to 2012.

Some commenters believe that RL already had a requirement to finish the 100 Area by 2011 and thus "Hanford 2012" actually slows work down. A Tri-Party Agreement milestone for completing 100 Area work has yet to be established. Several years ago, our schedules did show completing 100 Area soil remediation by 2011 under the assumption that our site budget would grow substantially. This 2011 date did not include completing removal of all excess, non-reactor facilities, which is concluded by 2012 under our plan.

The so-called "trade-off" for accelerating cleanup of the River Corridor means delaying some work on the Central Plateau. Work that would be slowed would be remediation of soil waste sites. With the elimination of release of liquids to these waste sites, further remediation should wait until characterization of these sites and tank farms sites can be completed to guide remediation decisions.

We also are committed to ensuring high priority work such as addressing groundwater, stabilizing plutonium in the Plutonium Finishing Plant, and storing Spent Nuclear Fuel away from the Columbia River will continue on or ahead of schedule. Likewise treatment of stored wastes will continue on schedule.

Comment 10: How much will Hanford 2012 cost?

Response: For Fiscal Year 2002, the cost to move forward with the Hanford 2012 plan would be \$762 million. That said, should we receive a different amount, we can still implement the plan – although it may impact our schedule.

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Comment 11: Fund B Reactor museum.

Response: DOE intends to conduct cleanup of B Reactor and the surrounding area as required by the Comprehensive Environmental Response, Compensation, and Liability Act. Following the successful cleanup, many both within and outside of DOE hope the B Reactor will become a museum. DOE will be working with stakeholders and regulators to protect important pieces of our Manhattan Project and Cold War history.

Comment 12: The 200 Area cleanup work should not be ignored.

Response: In addition to meeting full minimum safe requirements, remediation in the 200 Area will continue, including continuing of carbon tetrachloride pump-and-treat/vapor extraction, continuing of 233-S Decontamination and Decommissioning, and completion of B-Plant and PUREX roof replacement.

Comment 13: Continue Plutonium Finishing Plant plutonium stabilization work.

Response: RL intends to continue fully funding the Plutonium Finishing Plant stabilization work. It is a high priority for the Department.

Comment 14: RL should continue cleanup dialogue with the public.

Response: RL has every intention of continuing the ongoing dialogue on cleanup priorities with the public, the stakeholders, and the regulators. Not only does the Tri-Party Agreement require dialogue, we believe the best way to get good decisions and public support is to listen. Any revisions to the Tri-Party Agreement required to implement our plans would provide yet another opportunity for public involvement.

Comment 15: The President's budget only provided sufficient funding for the Spent Nuclear Fuel Project and the Plutonium Finishing Plant stabilization work. Other work, such as liquid effluent facilities, some groundwater pump and treat operations, soil remediation, and reactor Interim Safe Store projects were either shut down or significantly slowed. These are important to the protection of human health and the environment.

Response: Initial assessment of the President's budget indicates RL will be challenged to continue many projects at current levels. That said, we hope to find efficiencies through the top-to-bottom review and are optimistic about Congressional actions in support of higher Environmental Management funding.

Comment 16: With the Site facing budget cuts, how can DOE need more people to support clean up?

Response: RL's Federal staff will likely remain approximately level. The DOE Office of River Protection's budget, while not as large as hoped, is increasing because the oversight role of DOE over the contractor is important.

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Comment 17: Explain the relationship between RL and the Office Of River Protection (ORP).

Response: ORP's mission is to build and operate the Waste Treatment Plant to complete cleanup of Hanford's highly radioactive tank waste. RL's mission is best captured in the Hanford 2012 plan: restore the Columbia River Corridor; transition the Central Plateau to a long-term waste treatment and storage facility; and help the region prepare for the future, especially by being good stewards of the Pacific Northwest National Laboratory. RL is the site manager and integrator and works closely with ORP on common issues.

Comment 18: Several commenters expressed concern that delays in shutting down or restarting the Fast Flux Test Facility (FFTF) will adversely affect cleanup funding.

Response: Secretary Abraham has requested a 90-day review of the decision to shut down FFTF. Until that decision is made, FFTF will continue to be funded through the Nuclear Energy budget, not the Environmental Management budget and will thus not impact cleanup.

Comment 19: Once Fast Flux Test Facility (FFTF) is shut down how will DOE assure safe disposal of the sodium?

Response: FFTF constructed the Sodium Storage Facility on the basis of providing Resource Conservation and Recovery Act and Washington Administration Code 173-303 compliant storage for the sodium. Construction of the new facility closely coupled to the FFTF complex is required to support sodium drain operations. The facility will provide storage capacity for the 260,000 gallons of FFTF metallic sodium coolant. Sodium Storage Facility startup activities, which include final testing of the mechanical and electrical systems and confirmation that the facility is ready to receive sodium from FFTF, are to be conducted. The Office of River Protection will use the Hanford Site radioactive sodium inventory converted to sodium hydroxide in the Waste Treatment Plant for tank sludge pretreatment. An evaluation is to be conducted to evaluate where the sodium will be converted, i.e., an existing facility at the Idaho National Engineering and Environmental Laboratory or a newly constructed facility adjacent to the Sodium Storage Facility and to establish need dates for delivery of the caustic to Waste Treatment Plant.

Comment 20: Who will take care of sick workers? What will happen to them?

Response: The Department of Labor (DOL) is leading the effort to compensate former Hanford workers for occupational illnesses. DOE will support that effort in any way it can. We believe this program is an important step in recognizing the sacrifices made by our workers and ensuring they get necessary assistance. DOL office will open in July at 1029 North Kellogg, Kennewick Washington. Interested individual can contact the office at 1-888-654-0014 or local 509-783-1500.

Comment 21: Is DOE using new technology to address its cleanup problems?

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Response: We at RL are relying on new technology to help us solve some of our thorniest issues – like groundwater remediation and 618-10 and 11 burial ground remediation. Both the Spent Nuclear Fuel and Plutonium Finishing Plant projects have used significant new technology to help improve these processes. We work closely with the Pacific Northwest National Laboratory and have recently developed the “Hanford Site Cleanup Challenges and Opportunities for Science and Technology” plan.

NOTE: (1) This document does not reflect the public comments related to the Office of River Protection (ORP). Those comments will be submitted with the ORP IPL. (2) This does not reflect written comments received from the State of Washington Department of Ecology.